

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD OF PUERTO RICO

as Representative of THE COMMONWEALTH
OF PUERTO RICO, et, al

PUERTO RICO SALES TAX FINANCING
CORPORATION,

Debtors

PROMESA
Title III

No. 17 BK 3283- LTS
(Jointly Administered)

Claim Number: 29352

**RESPONSE TO PUERTO RICO SALES TAX FINANCING CORPORATION'S SIXTH
OMNIBUS OBJECTION TO DEFICIENT CLAIMS**

TO THE HONORABLE COURT:

Comes now, Creditor, Mirta Vincenty Cardona ("VINCENTY") and submits her response to COFINA Sixth Omnibus Objection to proof of claims number 29352. In support of her claim, Vincenty respectfully STATES and PRAYS as Follows:

1. On May 21, 2018, Vincenty filed her Proof of Claim for the amount of \$102,652.24 arising out of COFINA Bonds owed by Vincenty. (Claim number 29352.)
2. On December 5, 2018, COFINA filed its Sixth Omnibus Objection (Docket Entry 4410) allegedly as to deficient proofs of claims listed in Exhibit A: Insufficient Basis Bond Claims. Mirta Vincenty's claim number 29352 is included on pay 58 of said Exhibit A.
3. COFINA alleges that Vincenty has failed to provide the basis or documentation to justify said claim against COFINA.
4. Therefore, as evidence that Vincenty has a valid claim, Vincenty is submitting the following documents, attached hereto as Exhibit A.
 - a. Banco Santander Securities statement for the Period of September 1, 2018 –

September 30, 2018.

5. Section 502(a) of the Bankruptcy Code, 11 U.S.C. §502(a), states that a proof of claim is deemed to be allowed unless an objection is presented. COFINA objected to the validity of Vincenty's claim for failure to establish the validity of the claims. The documents presented in this response, serve as the corroborating evidence of Vincenty's claim.

6. Given the above, Vincenty respectfully asks this court to deny the Sixth Omnibus Objection with respect to claim number 29352.

WHEREFORE, it is respectfully requested from this Honorable Court to deny the Sixth Omnibus Objection with respect to claim number 29352 and find that Vincenty has provided the documentary evidence and basis needed to present a valid claim against COFINA.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 1st day of February 2018.

I HEREBY CERTIFY that on today's date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to all registered CM/ECF participants and a true and exact copy of this response was also served via First-Class Mail postage pre-paid to: i) Hon. Laura Taylor Swain's Chambers, United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Suite 3312, New York, New York 1007-1312; ii) Honorable Judge Judith Dein's Chambers Joseph Moakley United States Courthouse, One Courthouse Way, Room 6420, Boston, MA 02210-3002; iii) Office of the United States Trustee for Region 21, Edificio Ochoa, 500 Tanca Street, Suite 301, San Juan, PR 00901-1922; iv) Counsel for the Oversight Board, Proskauer Rose, LLP, Eleven Times Square, New York, New York, 10036- 8299, Attn: Martin J. Bienenstock, Paul V. Possinger, Ehud Barajk, and Maka Zerjal; and v) Counsel for the Unsecured Creditors' Committee, Paul Hastings, LLP, 200 Park avenue, New York, New York 10166, Attn: Luc A. Despina, James Bliss, James Wotrthington, and G. Alexander Bongartz.

DAGMAR FERNANDEZ, ESQ.

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s/Dagmar I. Fernandez

By: _____

Dagmar I. Fernandez, Esq.

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